

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JULIO M. HERRERA-VELUTINI,

Defendant.

CRIMINAL NO. 22-342
(SCC)(HRV)

MOTION TO RESTRICT

TO THE HONORABLE COURT:

COMES NOW the defendant, Julio M. Herrera-Velutini (“Mr. Herrera” or the “Defendant”), through his undersigned attorneys, who respectfully states and prays as follows:

1. Today, Mr. Herrera will file a motion related to a restricted filing (Dkt. 670) and respectfully requests that the Court accept the motion for filing with the following level of restriction: **Ex Parte; Restricted viewing to the Court.**

2. To protect the confidentiality of the matters set forth therein, which involve Mr. Herrera’s right to prepare a defense, it is necessary to file the motion with the requested level of restriction. The protection of the information detailed therein outweighs the presumption of public access.

WHEREFORE, Mr. Herrera respectfully requests that the motion remain sealed under the Ex Parte restriction level.

Respectfully submitted in San Juan, Puerto Rico, this 21st day of February 2025.

DLA Piper (Puerto Rico) LLC

/s/ Sonia I. Torres-Pabón

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CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that on this same date, we electronically filed the foregoing motion with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsels of record.

In San Juan, Puerto Rico, this 21st day of February, 2025.

/s/ Sonia I. Torres-Pabón

Sonia I. Torres-Pabón